

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T4-1, 2(i)-(j), AND 10)
(January 25, 2012)**

The United States Postal Service provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, dated December 29, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

James M. Mecone

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5402
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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T4-1 On page 15 of your testimony you state that operations would no longer be constrained by AADC/ADC distinctions because all facilities would be separated on an outgoing primary sort. Does this mean that the Postal Service would require all presorted mail to be sorted to a finer level than the AADC/ADC levels?

RESPONSE:

No. The reference cited in this interrogatory concerns the decline in the number of destinating plants remaining in the mail processing network to less than the current number of AADCs, as described in the hypothetical network considered as part of the testimony of witness Rosenberg (USPS-T-3). An expected reduction in the number of destinating plants would make it possible to sort to the final plant.

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APWU/USPS-T4-2 On page 16 of your testimony you state that the proposed network and relaxed expectations of overnight service would “narrow the 2-day delivery range and enlarge the 3-day delivery range, which is anticipated to generate significant improvement in operating efficiency.” Since the measure of customer expectations is keyed to actual mail delivery rather than service standard day ranges please provide the following information.

i) What percentage of Periodical mail would be expected to actually be delivered in two days under the proposed plan?

j) What percentage of Periodical mail would be expected to actually be delivered in three days under the proposed plan?

RESPONSE:

(i-j) The Postal Service has determined that its current data on commercial mail are not sufficiently detailed to provide the information requested by this interrogatory. This is because the current overnight mail which could stay overnight is currently prepared in presorted bundles that are intra-SCF and would also contain mail moving to two-day. Also, there are no data sources beyond Full Service IMb Periodicals mailers that could be used to develop an appropriate class or product-wide representative O/D pair flow. Full Service IMb data are generated predominantly by larger volume mailers, rather than the Within County mailers and smaller mailers sending the publications end-to-end.

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APWU/USPS-T4-10 In determining how much equipment will be needed in the future, more consolidated, mail processing network, how much equipment redundancy is being built in to ensure that service standards can be met despite inevitable machine downtime?

RESPONSE:

Please see the response of witness Rosenberg (USPS-T-3) to APWU/USPS-T3-

14.